

# PSJ3

## Exhibit 609



# McKesson Controlled Substances Monitoring Program

## FAQs for Pharmacies

### 1. Why is McKesson implementing this program?

McKesson and all wholesalers have always been required to monitor the distribution of controlled substances, and now the DEA is requiring all wholesalers to implement tighter controls. With our CSMP, we have developed a technology solution to automate the monitoring of controlled substances and proactively communicate with customers.

### 2. Is McKesson the only wholesaler required to implement this type of program?

No, all U.S. pharmaceutical wholesalers are being required to meet the DEA's requirements for tighter controls on controlled substances. The Controlled Substance Monitoring Program is McKesson's solution to the DEA's requirement, but the requirement is the same for all drug wholesalers.

### 3. How will this affect my pharmacy business?

There should be no significant impact to your business. The system monitors purchases of your controlled substances and compares them to your thresholds. We've taken care to set your threshold based on your controlled substance order history, and have put a program in place to give you plenty of notice if you are close to exceeding your threshold for a given product.

### 4. What changes will I see?

A new alert message will appear in your ordering system and on your invoice if you approach your threshold for a product. If you exceed your monthly purchase threshold, you will see the "V" omit code in your ordering system and on your invoice or delivery document to indicate the product has been omitted from your order because you exceeded your order limit.

### 5. McKesson states that you will be "monitoring" all of my controlled substances. How is this being done?

After conducting extensive analysis on controlled substances purchases, we have created a technology solution that has visibility to your controlled substances purchases and compares your purchases to your designated thresholds.

### 6. How are my thresholds determined?

A threshold is established for each individual pharmacy. Your thresholds have been determined based on your 12-month purchase history.

### 7. McKesson states that I will receive an alert if I reach my threshold amount. How will I receive this notification?

Threshold alerts will appear for each product ordered on your invoice or delivery document. They will also appear in your electronic ordering system.

**8. What if I exceed my threshold?**

You will always receive a threshold alert on your invoice or delivery document well in advance of exceeding your threshold, so you can monitor purchases or apply for a threshold change. If you still exceed your threshold, you will see the new code "V OMIT" with the message "Monthly Regulatory Maximum Purchases Exceeded" on your invoice, as well as in Order Acknowledgment or Invoice Acknowledgement (depending on your ordering system). That particular item will be omitted from your order and will not be shipped.

**9. You said that McKesson is conducting real-time monitoring of controlled substance purchases according to DEA base code. How can I get more information on DEA base codes?**

Please check the DEA Web site for all base codes and associated product categories:  
[www.deadiversion.usdoj.gov/arcos/ndc/ndc\\_dic.htm](http://www.deadiversion.usdoj.gov/arcos/ndc/ndc_dic.htm).

**10. What if I have a change in my business (for example, I acquire a new pharmacy or pursue another line of business)? Am I in danger of not being able to order enough product because of my previous order history?**

We have created a Threshold Change Request process. If you do anticipate a change to your business, contact your McKesson sales representative as soon as possible so we can initiate the change request process.

**11. How do I request a change in my threshold amounts?**

Contact your McKesson sales representative.

**12. Who do I contact if I have questions?**

Contact your McKesson sales representative.